

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Rules and Regulations Implementing	)	
Minimum Customer Account Record	)	CC Docket No. 02-386
Exchange Obligations on All Local and	)	
Interexchange Carriers	)	

**COMMENTS OF NEUSTAR, INC.**

NeuStar, Inc. (“NeuStar”) submits the following comments in response to the Federal Communications Commission’s (“Commission”) Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1</sup> In the NPRM, the Commission requests comment on issues related to whether it should impose mandatory minimum Customer Account Record Exchange (“CARE”) obligations on all local and interexchange carriers. In doing so, the Commission seeks comment on certain proposed CARE standards, including the cost and burden on carriers for implementing, developing and operating those standards, the flexibility of transmission, and the timeliness and accuracy of such standards.<sup>2</sup> NeuStar operates an OSS CARE Clearinghouse to a broad range of customers including local exchange carriers (“LEC”), competitive LECs (“CLEC”) and interexchange carriers (“IXC”). As a neutral third party provider of an OSS CARE Clearinghouse, NeuStar is in a unique position to comment on the efficiencies, timeliness and accuracy of exchanging CARE

---

<sup>1</sup> *Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers*, Notice of Proposed Rulemaking, CG Docket No. 02-386 (rel. Mar. 25, 2004) (“NPRM”).

information.<sup>3</sup> In these comments, NeuStar discusses the various features and advantages associated with use of a clearinghouse for CARE transactions. These advantages can be discussed in terms of CARE implementation, quality of CARE records, and the timeliness of the CARE records exchange.

## **INTRODUCTION**

CARE refers to a set of standards used to facilitate the exchange of account-related information between local telephone service providers and long-distance carriers. It includes critical information necessary for ordering, provisioning and most importantly, billing customers in a timely and accurate manner. The need for CARE procedures arose after the divestiture of the Bell System in 1984 when local telephone service was unbundled from long-distance service. LECs were then required to provide customers with equal access to all long-distance carriers. Equal access allowed customers to route their calls over the network belonging to the long-distance company of their choice. The need for CARE heightened after the passage of the Telecommunications Act of 1996, as competition in the local exchange service market allowed customers the ability to select a local service provider of their choice.

The transmission of CARE varies among service providers and includes a variety of mediums: fax, e-mail, cartridge, Internet or mechanized file processing. The exchange often

---

(Footnote continued from previous page)

<sup>2</sup> NPRM at ¶¶ 12, 14-16.

<sup>3</sup> NeuStar limits its comments to a discussion of the efficiencies gained through use of a CARE Clearinghouse and does not comment on whether the Commission should implement mandatory minimum CARE standards.

requires that connectivity and interface agreements be established between providers to handle such functions as ordering and provisioning.

Customers are greatly affected if CARE records are not exchanged properly or promptly. If a carrier does not participate in any kind of CARE process, or if a new entrant in the local carrier market is unfamiliar with CARE practices, there may be some problems that arise including: delay in the transmission of records, transmission of records in formats that do not meet the industry standard or a complete failure to send the records, and loss of a customer's service order. This can result in message rejections and the need for the original carrier to resend the record, leading to higher overall carrier expense to provide service. In turn, if CARE records are not processed promptly or correctly, carriers may bill customers improperly. The billing problems that could result include continuation of monthly recurring charges by the old carrier (continued billing), double billing, or billing at casual rates.<sup>4</sup>

### **CARE Implementation, Quality and Timeliness**

Two of the greatest expenses involved in the exchange of CARE records involve implementing individual carrier interfaces and tracking changes in CARE and carrier interface requirements. A clearinghouse model is designed to allow a carrier to access all other carriers through a single interface to that clearinghouse. By affecting the exchange of records through a clearinghouse, a carrier need only maintain one interface, greatly reducing the cost. Without the central hub provided by a clearinghouse, maintenance of CARE systems can be difficult, because LECs with automated interfaces continually make changes and improvements to their interfaces. Tracking changes over multiple interfaces can be a

---

<sup>4</sup> *Id.* at ¶¶ 5, 9, 13.

logistical challenge for any carrier, let alone a small carrier with limited resources. A clearinghouse can absorb this work by acting as the carrier's single interface, making the updates and necessary maintenance invisible to the small carrier.<sup>5</sup>

The ability to accommodate multiple interfaces as well as the validation and tracking capabilities of a clearinghouse ensure that records conform to quality and timing standards. A clearinghouse validates all incoming data to ensure it is complete and in conformance with Ordering and Billing Forum ("OBF") standards before forwarding it to the receiving carriers. A clearinghouse also tracks all incoming and outgoing records to ensure carriers meet agreed upon timing standards. Assisting the carriers in such a manner will reduce CARE message rejects and resends, helping both sending and receiving carriers to avoid the associated costs and delays of each.

In the development and administration of its clearinghouse, NeuStar has engaged in extensive customer training on the use of CARE. As a result, carriers are more likely to implement CARE and do so in such a manner as to make it easier to trade CARE messages with other carriers in an accurate, efficient, and timely manner. NeuStar CARE Clearinghouse member companies are obligated to meet specific service level agreements ("SLA") to ensure performance measurements are met for timeliness, accuracy and completeness of CARE data. NeuStar's clearinghouse provides customer support and

---

<sup>5</sup> The NeuStar OSS CARE Clearinghouse offers carriers a single interface solution to exchange CARE activity. Rather than carriers establishing direct interfaces to each and every provider, participating members route all CARE activity through NeuStar, which is then passed to intended trading partners. NeuStar offers members various transmission options including Connect:Direct, File Transfer Protocol ("FTP"), E-mail, or NeuStar's web based Graphical User Interface.

monitors and tracks CARE data to assist member companies in meeting their SLAs.<sup>6</sup> Carrier start up and ongoing costs are minimal with discounts applied when monthly SLAs are achieved.

A carrier's ability to track information is crucial to meeting its SLAs. All incoming and outgoing CARE transactions are time stamped in the NeuStar Clearinghouse. The time stamp is used throughout the process to determine whether the timeliness of the record exchange meets the carrier's obligations under its SLA. For example, the NeuStar CARE Clearinghouse Service Center monitors presubscribed interexchange carrier ("PIC") change requests sent to intended LECs to insure responses are returned within the agreed time period set forth in the SLAs. This monitoring is performed utilizing "jeopardy" and "overdue" messages generated from the CARE Clearinghouse application. A PIC change request passed to an intended LEC carries an initial message state of "pending." If there is no reply transaction after an agreed upon time period, the application triggers a "jeopardy" message and then an "overdue" message. Throughout the process, the NeuStar Clearinghouse calls the LEC to inform it that its transactions are in jeopardy and approaching overdue status. Such calls raise the LEC's awareness that transactions reaching overdue status may cause customer dissatisfaction, negative revenue impacts and missed SLAs.

---

<sup>6</sup> A clearinghouse can track and record care messages sent and received. Tracking and recordation assists in ensuring that CARE is being sent in a timely manner by the parties. It also provides a history that can be made available in the case of carrier disputes. All CARE data passed through the NeuStar Clearinghouse is accessible via the NeuStar Graphical User Interface for a period of three months. NeuStar maintains archived records for a period of seven years and makes them accessible to CARE Clearinghouse members.

A clearinghouse can assist carriers who do not have the ability to transmit CARE in an automated manner by providing the ability to transmit electronically CARE information in the proper OBF standardized format to the relevant IXC's. This can be done via Graphical User Interface ("GUI"). A GUI can enable carriers for which volumes do not justify intensive development of an automated system to manually enter data while the receiving carrier can accept the data in a standard automated format and not have to decipher handwritten faxed messages.<sup>7</sup> A clearinghouse also can support multiple interfaces from various sending carriers and forward the necessary information to the receiving carrier in the format preferred by that carrier. Such standardization applied to all CARE record exchanges greatly reduces errors, delays and manual intervention required to process an order.

A clearinghouse's ability to train carriers in the implementation and operation of CARE, to validate and track the quality and timeliness of records, and to provide a central, single interface for carriers of various levels of technical sophistication, greatly enhances a carrier's ability to meet its CARE obligations in a timely and cost effective manner.

## **CONCLUSION**

The minimum CARE standards set forth in the Commission's NPRM and as described in the Joint Petitioner's petition are included in the services offered by NeuStar's CARE Clearinghouse, and are in fact, used today by NeuStar's LEC, CLEC and IXC customers. By using the CARE Clearinghouse, carriers can be certain that the necessary

---

<sup>7</sup> All CARE records exchanged via NeuStar are compliant with OBF industry standards and goes well beyond the Joint Petitioners recommended "mandatory minimum CARE obligations. NPRM at 11.

CARE information is exchanged in a timely, accurate, and complete manner. Due to the clearinghouse methodology, the burden of exchanging information on all carriers is minimal – there is no need for a carrier to interact with many other IXC's and LEC's, it need only interact with the CARE Clearinghouse, thereby reducing the cost and resources necessary to implement and support CARE exchange.

Respectfully submitted,

/s/\_\_\_\_\_  
Kimberly Wheeler Miller

NeuStar, Inc.  
2000 M Street, N.W., Suite 600  
Washington, D.C. 20036  
(202) 533-2912

June 3, 2004